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Attorneys for Defendant NORICK JANIAN, M.D.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

VALERIE GEORGE, as Administrator and Personal Representative of THE ESTATE OF RYAN GEORGE, VALERIE GEORGE and TAJMAH BEAUCHAMP, as Legal Representatives for JAIDA GEORGE and RYAN GEORGE, JR., VALERIE GEORGE, Individually, DONALD GEORGE and TAJMAH BEAUCHAMP, individually

## Plaintiffs,

vs.

SONOMA COUNTY SHERIFF'S  
DEPARTMENT, BILL COGBILL, COUNTY  
OF SONOMA, CALIFORNIA FORENSIC  
MEDICAL GROUP, INC., MICHAEL DAGEY,  
RN, SUTTER HEALTH, SUTTER MEDICAL  
CENTER OF SANTA ROSA; EDWARD W.  
HARD, M.D.; RICHARD FLINDERS, M.D.;  
JOSEPH MATEL, M.D.; NORICK JANIAN,  
M.D. and DOES 1-25, Inclusive,

## Defendants.

No. CV 3:08-CV-02675-EDL

**STIPULATION AND ORDER EXTENDING  
TIME TO RESPOND OF DEFENDANT  
NORICK JANIAN, M.D.**

It is stipulated by and between Plaintiffs VALERIE GEORGE, as Administrator and Personal Representative of THE ESTATE OF RYAN GEORGE, VALERIE GEORGE and TAJMAH CHAMP, as Legal Representatives for JAIDA GEORGE and RYAN GEORGE, JR., VALERIE GE, Individually, DONALD GEORGE and TAJMAH BEAUCHAMP, individually and

1 Defendant NORICK JANIAN, M.D., that defendant shall have until December 26, 2008 to file and serve  
2 a responsive pleading pursuant to Federal Rule of Civil Procedure 12.

3 Dated: December \_\_\_, 2008 SANFORD WITTELS & HEISLER, LLP

4 By \_\_\_\_\_ /s/  
5 Steven L. Wittels, Esq.

6 Attorney for Plaintiffs VALERIE GEORGE, as Administrator and  
7 Personal Representative of THE ESTATE OF RYAN GEORGE,  
VALERIE GEORGE and TAJMAH BEAUCHAMP, as Legal  
Representatives for JAIDA GEORGE and RYAN GEORGE, JR.,  
VALERIE GEORGE, Individually, DONALD GEORGE and TAJMAH  
8 BEAUCHAMP, individually

9  
10 Dated: December \_\_\_, 2008 ROGASKI, PREOVOLOS, WEBER & PATTERSON, LLP

11 By \_\_\_\_\_ /s/  
12 William F. Horsey, Jr.  
13 Attorney for Defendant NORICK JANIAN, M.D.

14 It Is So Ordered

15 Dated: December 23, 2008

16  
17 Elizabeth Laporte  
18 Magistrate Judge  
United States District Court for the N



**DECLARATION ATTESTING TO CONCURRENCE IN FILING**

I, William F. Horsey, Jr., say:

1. I am an attorney at law, duly licensed to practice before the courts of this state and am a member of the law firm of Rogaski, Preovolos, Weber & Patterson, LLP, attorneys for Defendant, NORICK JANIAN, M.D.

2. I make this Declaration attesting to concurrence in the filing of the Stipulation and Order Extending Time to Respond of Defendant NORICK JANIAN, M.D.

3. On or about December 10, 2008, my office contacted the offices of Sanford, Wittels & Heisler, LLP, attorneys for Plaintiffs, to request an extension of time to respond to the Amended Complaint, which extension was granted pending filing of the within Stipulation and Order, which was provided to counsel via facsimile on the same date.

4. On or about December 10, 2008, I was contacted by Sanford, Wittels & Heisler, LLP via electronic mail and advised that the Stipulation and Order meets with the approval of Steven L Wittels, Esq., and requesting that the Stipulation and Order be filed with an “/s/” signature.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 17, 2008.

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William F. Horsey, Jr.